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Attorneys for Defendants FORTY NINERS FOOTBALL  
COMPANY LLC, FORTY NINERS SC STADIUM  
COMPANY LLC, FORTY NINERS STADIUM  
MANAGEMENT COMPANY LLC, CITY OF SANTA  
CLARA and SANTA CLARA STADIUM AUTHORITY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

ABDUL NEVAREZ, PRISCILLA  
NEVAREZ, and SEBASTIAN  
DEFRANCESCO, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

FORTY NINERS FOOTBALL  
COMPANY, LLC, a Delaware limited  
liability company; FORTY NINERS SC  
STADIUM COMPANY, LLC, a  
Delaware limited liability company;  
NATIONAL FOOTBALL LEAGUE;  
CITY OF SANTA CLARA; SANTA  
CLARA STADIUM AUTHORITY;  
TICKETMASTER ENTERTAINMENT,  
INC.; FORTY NINERS STADIUM  
MANAGEMENT COMPANY LLC; and  
DOES 1-10, Inclusive,

Defendants.

Case No. 4:16-cv-07013-HSG

**STIPULATION AND ORDER ADVANCING  
HEARING DATE ON DEFENDANTS'  
MOTION TO MODIFY THE SETTLEMENT  
ORDER FOR AN EXTENSION OF TIME  
FOR THE CITY OF SANTA CLARA  
PEDESTRIAN RIGHTS OF WAY  
REMEDiation**

Date: December 14, 2023

Time: 2:00 p.m.

Place: Courtroom 2

Judge: Hon. Haywood S. Gillam, Jr.

**THIS STIPULATION** is hereby entered into by and between Plaintiffs Abdul Nevarez,  
Priscilla Nevarez, and Plaintiff Sebastian DeFrancesco on behalf of themselves and all others

1 similarly situated (collectively, “Plaintiffs”), and Defendants the City of Santa Clara and the  
 2 Santa Clara Stadium Authority (collectively, “Santa Clara”), by and through their respective  
 3 counsel of record, as follows:

4 **WHEREAS**, Santa Clara’s Motion to Modify the Settlement Order for an Extension of  
 5 Time for the City of Santa Clara Pedestrian Rights of Way Remediation (ECF No. 487) is  
 6 currently set for December 14, 2023, and

7 **WHEREAS**, the relief requested therein is an extension of time for the deadline to  
 8 remediate certain specific conditions in the Pedestrian Right of Way (the “subject conditions”)  
 9 from January 23, 2024 to December 31, 2025, and

10 **WHEREAS**, Santa Clara respectfully requests that the Court advance the hearing date for  
 11 the motion because the current hearing date of December 14, 2023’s proximity to the current  
 12 remediation deadline of January 23, 2024 means Santa Clara would have to immediately expend  
 13 resources related to the remediation of the subject conditions that would prove unnecessary  
 14 should the Court grant the motion, and

15 **WHEREAS**, Plaintiffs will oppose the motion but will stipulate to an earlier hearing date  
 16 of November 16, 2023,

17 **NOW, THEREFORE, IT IS HEREBY STIPULATED** as follows:

18 1. Defendants’ Motion to Modify the Settlement Order for an Extension of Time for  
 19 the City of Santa Clara Pedestrian Rights of Way Remediation, currently set for December 14,  
 20 2023, shall be advanced to **November 16, 2023 at 2pm.**

21 **IT IS SO STIPULATED.**

22 Dated: September 29, 2023

23 Respectfully submitted,

24 GOLDSTEIN, BORGAN, DARDARIAN & HO

25 /s/ Andrew P. Lee

26 Andrew P. Lee

27 Attorneys for Plaintiffs and the Certified Classes

RANKIN, SHUEY, MINTZ,  
 LAMPASONA & HARPER  
 475 14<sup>TH</sup> Street, Suite 650  
 Oakland, CA 94612

1  
2 Dated: September 29, 2023

RANKIN, SHUEY, RANUCCI, MINTZ,  
LAMPASONA & REYNOLDS

3  
4 /s/ Maria Lampasona  
5 Maria M. Lampasona  
6 Attorneys for Defendants  
7 CITY OF SANTA CLARA, SANTA CLARA  
8 STADIUM AUTHORITY

9  
10 **SIGNATURE ATTESTATION**

11 The e-filing attorney hereby attests that concurrence in the content of the document and  
12 authorization to file the document has been obtained from each of the other signatories indicated  
13 by a conformed signature (/s/) within this e-file document.


14 Dated: September 29, 2023

/s/ Maria Lampasona

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LAMPASONA & HARPER  
475 14<sup>TH</sup> Street, Suite 650  
Oakland, CA 94612

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2  
3 Dated: 9/29/2023

  
Hon. Haywood S. Gilliam, Jr.  
United States District Judge

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STIP & ORDER RE: ADVANCE  
HEARING ON MOTION  
NO. 4:16-CV-07013-HSG